

Privacy Notice / Customers & Prospects Information regarding the Processing of Personal Data

Dear customer/future customer,

We are very delighted that you have shown interest in our enterprise. Data protection is of a particularly high priority for the management of the EXTEDO GmbH.

EXTEDO processes personal data in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) which came into effect on the 25th May 2018.

This privacy statement aims to give you the following information:

- EXTEDO's identification and contact. EXTEDO's DPO contact
- Which data does EXTEDO process?
- For which purpose(s) is EXTEDO collecting your personal data and what is the legal basis for doing it.
- How do we store your personal data and for how long?
- With whom we share your personal data
- How do we protect your personal data?
- Your rights as a data subject and the contact of the Supervisory Authority (right to lodge a complaint)

Name and Address of the Controller

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

EXTEDO GmbH
Einsteinstraße 30
85521 Ottobrunn
Germany

Phone: +49 89 189454-0

EXTEDOs Global Data Protection Officer is happy to help with questions or inquiries.

Email: privacy@extedo.com

Which data does EXTEDO process?

As our customer or future customer, the data we receive from you or we might ask you for can be included in the following categories: identification and address data, contact details, forecast data, contract data, interests/preferences, billing information: payment data and bank details, IT usage data: IP address, location data, contract master data.

Our purposes for collecting your data and legal basis

We will only process your personal data according to one or several of the next defined purposes:

- a) Acquisition of prospective, potential customers for sales generation, customer care and contract management.
- b) Definition of requirements for product development, user documentation, evaluation of 3rd party systems (suppliers) needed for use in EXTEDO products.
- c) Acquisition of interested parties to generate sales.
- d) Lead generation, customer communication, customer care
- e) Customer support for EXTEDO customers and for partners:
 - Technical (first, second, third level) support for EXTEDO application
 - Remote support for EXTEDO customer and partner
 - Email and phone support
 - Web Portal

Data processing for other purposes is only considered if the necessary legal requirements are available in accordance with article 6 (4) GDPR. We will be aware of any information obligations under article 13 (3) DSGVO and article 14 (4) DSGVO.

Legal basis for our processing activities will fall under the below listed options:

- Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose, e.g. Newsletters.
- If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services.
- Whenever our company is subject to a legal obligation by which processing of personal data is required, such as for the fulfillment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR.
- Processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used if processing is necessary for the purposes of the legitimate interests pursued by

our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. A legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR). To carry out our business in favor of the well-being of all our employees and the shareholders can be seen also as our legitimate interest.

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded.

Recipients

For the purposes described above, the mentioned categories of data might be disclosed to EXTEDO's qualified and/or management personnel working for the following departments: Global Alliance & Marketing, Partner Management, Legal & Finance, Consulting, Quality Management, Product Management, Sales, Customer Support. Personal information may also be disclosed to EXTEDO Affiliates for the purposes described above.

To the extent EXTEDO engages third party processors, these processors may also have access to personal information in order to assist in the provision of services (e.g. website hosting, professional services including information technology services and related infrastructure, customer support). Such processors shall be subject to the same level of data protection and security as EXTEDO, the contractual relationship is in accordance with Art. 28 GDPR.

Specific Services

More specifically, if you subscribe to eSUBmanager throughout our online platform, only those EXTEDO employees within Sales, Customer Support and Finance will have access to your data.

EXTEDO is using Chargebee (www.chargebee.com) as a subscription billing service provider for managing billing and subscriptions for eSUBmanager customers. Chargebee is a PCI Data Security Standard (PCI DSS) Level 1 provider. For more information of certifications and security controls of Chargebee, please check [its site \(https://www.chargebee.com/security/\)](https://www.chargebee.com/security/).

“Usability of the Software” Tool

Additionally, some of EXTEDO software products have implemented feedback tools that measures the software usability and help EXTEDO to gauge the level of user satisfaction with the software product. Anytime this happens, the user is asked for previous consent to gather that data: name of the used function, time of execution and duration of execution. Data is aggregated and the software itself generates a report with those metrics. The user must actively send such report back to EXTEDO, having the full control of the report and with whom is shared.

International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

Specifically, our group company and third-party service providers and partners may operate around the world. For this reason, we have taken safeguards to require that your personal information will remain protected in accordance with this Privacy Policy. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies. We have also implemented safeguards with our third-party service providers and partners which are certified under EU-US Privacy Shield.

How do we protect your personal data?

Our infrastructure has technical and organizational security measures in place to ensure the most complete protection of the personal data to be processed.

However, no system is perfect or can guarantee that unauthorized access or theft of information will not occur. We and our business partners work hard to maintain physical, electronic and procedural safeguards to protect your information in accordance with applicable data protection requirements. Our main security measures are:

- Tightly restricted access to your data on a "need to know" basis and for the communicated purpose only
- Transferred collected data only in encrypted form, e.g. via our recruiting portal
- Firewalled IT systems to prohibit unauthorized access e.g. from hackers
- Permanently monitored access to IT systems to detect and stop misuse of personal data.
- Regular training of our staff to protect against loss, misuse and alteration of the information under our control.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so for example, to provide you with a service you have requested, to retain your information for future marketing purposes or to comply with applicable legal, tax or accounting requirements.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted.

Your data protection rights

You have the following data protection rights, which you can exercise by contacting us using the details below:

- The right to **access, correct, update or request deletion** of your personal information.
- The right to **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information.

- The right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. Alternatively, you can indicate your marketing preferences for email, phone and postal marketing during registration or at any time by contacting us using the contact details provided below.
- The right, if we have collected and processed your personal information with your consent, to **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- The **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Additional information is provided via our website.

Supervisory Authority.

As data subject, you must be informed about the possibility of lodging a complaint to the competent Supervisory Authority:

Bayerisches Landesamt für
Datenschutzaufsicht

Promenade 27

91522 Ansbach

Telefon +49 (0) 981 53 1300

Telefax +49 (0) 981 53 98 1300

E-Mail presse@lda.bayern.de

Webseite www.lda.bayern.de