

Data Privacy Statement

Communication

Document information

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Data Privacy Statement Communication

This Data Privacy Statement relates to data processing in connection with electronic communication (by e-mail, fax, telephone, etc.) between employees of PTV GmbH and interested parties, new or existing customers. In addition to support cases and reseller constellations, proactive inquiries about our services and products via such contact channels are also covered.

The Data Privacy Statement concerning data processing in connection with electronic communication in the case of applications and application processes can be found in the [Data Privacy Statement for Costumers and interested parties](#)¹. For data subjects from the USA and Canada please see [Data Privacy Statement for interested parties and customers \(USA and Canada\)](#)².

1 Our contact details and general information on data processing

1.1 Controller

Responsible in the sense of data protection law for the collection and use of personal data is

PTV Planung Transport Verkehr GmbH

Haid-und-Neu-Str. 15

76131 Karlsruhe, Deutschland

Mail: info@ptvgroup.com

1.2 Data Protection Officer

Our external data protection officer can be contacted at datenschutz@ptvgroup.com.

1.3 Situations in which we process your Personal Data

1.3.1 Data processing when you contact us by e-mail, fax, telephone

When you write us an e-mail, call us or send us a fax, we inevitably process personal data from you. This is because at least the personal data transmitted with the e-mail, fax or your telephone will be stored by us or our systems.

The processing of personal data when transmitted by e-mail, fax or telephone, serves us to deal with your contact inquiry and your request. We absolutely need your e-mail address, your fax number or your telephone number in order to be able to reply at all. This is also the legitimate interest in processing the data.

¹ <https://www.ptvgroup.com/en/legal-documents/data-privacy-statement>.

² <https://www.ptvgroup.com/en/legal-documents/data-privacy-statement-us>

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. For personal data sent by e-mail, this is the case when the respective conversation with you has ended, and we have then waited a grace period of up to 3 months to see whether we may need to refer to your request or the details of the communication again. The conversation is terminated when it is clear from the circumstances that the matter in question has been conclusively clarified.

Fax data is stored separately from print data in the device memory of the fax machine. After the fax has been printed out, the occupied memory space is released again so that the next fax can be received and stored there. Parts of the fax can remain temporarily in the device memory after printing until they are overwritten by the next received fax. Normally this leads to an automatic deletion of the data after approx. 1-2 weeks. If it is a computer fax, we receive your fax as an e-mail and the explanations for e-mail apply accordingly.

In the case of incoming and outgoing calls to us, your telephone number or your name/company name stored with your telephone provider as well as the date and time of the call are stored in our telephone system in a so-called ring buffer, which overwrites the oldest data with new data. In general, this leads to an automatic deletion of the data in the telephone system after approx. 3-4 months.

The communication may be subject to a retention obligation under commercial or tax law, which then takes precedence over the deletion (cf. the explanations above on "Data deletion and storage period").

1.3.2 Data processing in the context of further communication

If further communication with you takes place after you have contacted us, further data processing may follow on the basis of the knowledge gained about you, depending on whether you are communicating with us as an interested party, as a new customer, as an existing customer, as a service provider, business contact or similar.

1.3.3 Data processing regarding interested parties and new customers for the purpose of contacting, advertising, and ordering

We collect and process personal data from interested parties and potential new customers for the purpose of contacting them and presenting our products and services to them.

We process the data that you transmit to us voluntarily in connection with the communication in view of the respective means of communication or the data that is mandatory to enable communication.

1.3.4 Data Processing regarding existing customers for the purpose of contract fulfillment (especially in support cases) and customer retention

We collect and process personal data from our customers for the purpose of fulfilling our contractual obligations, in particular to provide support services in the event of problems, defects or errors (support cases).

In addition, we process customer data to offer customers further, similar services in addition to the services they have already received, as well as in order to be able to provide service offers for our customers and to carry out corresponding measures.

The data collection and data processing are carried out, for example, by the department responsible for contract and order processing, by the support department or by our existing customer service.

1.3.5 Data processing regarding service providers and other business contacts for the purpose of cooperation or business exchange

We collect and process personal data from service providers and business contacts for the purpose of communicating about future or existing cooperation or other business issues.

We process the data that is transmitted to us voluntarily by you in connection with your approach or the communication in view of the respective means of communication or the data that is compulsory to enable the communication.

1.3.6 Data processing for the purpose of statistics, internal reporting and controlling

In addition, we process your personal data for our own purposes; for keeping internal statistics and for our internal reporting and controlling. By evaluating this data, we want to gain insights that help us to further improve ourselves and our offers and to keep them relevant for interested parties and customers.

1.3.7 Data processing in the case of reseller activities of PTV GmbH

We act as resellers (brokers) for various companies and broker business between them and their customers as an interface.

For example, if you are interested in Microsoft's Bing Maps service from Switzerland or Germany, Microsoft will ask you to contact us. In the event of an order, we will then order the desired Microsoft services for Bing Maps from Grey Matter Ltd, The Old Maltings, Prigg Meadow, Ashburton, Devon, TQ13 7DF, England (<https://greymatter.com/corporate/>) as a Microsoft Gold Partner on your behalf.

The transfer of your data to Gray Matter Ltd. in England is permitted on the basis of an existing adequacy decision regarding the level of data protection in the UK being equivalent to that in the EU (Art. 45 (1) GDPR).

In the context of this reseller activity, we conclude an agency agreement with you, which includes the billing by us for the services provided directly by the service provider (e. g. Microsoft).

The legal basis for this data processing is the brokerage contract concluded between us respectively the preparatory actions for its conclusion (Art. 6 (1) (b) GDPR).

Based on this contract, we store your data for the duration of the contractual relationship and delete it at the latest when the contract is finally terminated and claims arising from it can no longer be asserted (statute of limitations), which is regularly three years after the end of the contract, starting on December 31 of the year in question.

It may be that we also perform such reseller activities for other providers and services. In that case, the procedure described here for Bing Maps will apply there in a comparable manner. Since you are referred to us by the respective provider to initiate a contract, you are also already aware of our reseller activities when you contact us.

1.4 Data processing outside the EU or the EEA

As described above in the description of the tools used, it is possible that data processing takes place outside the EU or the EEA (i. e. in a so-called third country). This may in particular concern data processing in the USA.

We have concluded a Data Processing Addendum with the respective providers, which guarantee us the right to issue instructions and in which the providers ensure compliance with the statutory data protection regulations. In addition, we have agreed to the EU standard contractual clauses on data protection adopted by the European Commission to regulate the transfer of data outside the EU or the EEA with the respective providers.

In individual cases, it may also be the case that instead of using the EU standard contractual clauses or in addition to these, we carry out the data transfer with the data recipient in the third country based on its Binding Corporate Rules (BCR). These are internal binding data protection rules of the data recipient that have been previously reviewed and approved by the competent data protection authority. These BCR are also appropriate safeguards for such a data transfer (cf. Art. 46 (2) (b) in conjunction with Art. 47 GDPR).

No other transfer of the collected data to external recipients takes place.

2 Tools & Programmes

2.1 Data processing through the use of Microsoft 365

To support our internal and external communication, collaboration, and document management, we use various applications from the Microsoft 365 product family, provided by Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland ("Microsoft").

As part of this use, personal data is processed to ensure the smooth running of business processes and to guarantee an efficient, secure, and modern communication and working environment. This includes, in particular, email communication, online meetings, joint document editing, and the use of supporting AI functions.

2.1.1 Applications

2.1.1.1 Email

We use Microsoft Outlook as part of the Microsoft 365 software package for email communication. We use Outlook to efficiently receive, manage, forward internally, and respond to incoming emails. In the course of email communication, personal data such as name, email address, communication content, and any attached documents are processed.

This data is processed for the purpose of communicating with customers, business partners, and other contacts, and is used to process inquiries, initiate or execute contracts, and for general business correspondence.

The legal basis for data processing can be found in section 4 Legal bases for data processing.

2.1.1.2 Microsoft Teams & Copilot

We use the "Microsoft Teams" software for planning, conducting, and following up on online meetings. Through integration with other applications in the Microsoft 365 package, Microsoft Teams supports the efficient, structured, and secure organization and handling of virtual meetings.

The purpose of data processing is to conduct and manage online meetings, including communication, coordination, and collaboration between participants.

The legal basis for data processing can be found in section 4 Legal bases for data processing.

Microsoft Teams also offers the option of recording and transcribing meetings. In addition, Microsoft provides a function with the "Microsoft Copilot" application that enables content analysis of the transcriptions created.

The purpose of the associated data processing is exclusively to record, transcribe, and evaluate the content of the meeting transcripts. No analysis or evaluation of personal data for the purposes of behavioural, performance, or personality analysis of the participants takes place.

The legal basis for the recording, transcription, and subsequent evaluation of the meeting using Microsoft Copilot is the express consent of the respective participant in accordance with Art. 6 (1) (a) GDPR. Before recording begins, all participants are informed about the intended recording and transcription. In this context, the participants' cameras and microphones are deactivated by default. The above-mentioned functions can only be activated after the respective person has actively consented to the processing of their personal data via a corresponding button in Microsoft Teams.

Consent applies exclusively to the respective meeting and must be given again for each new appointment. Participants can revoke their consent for the meeting at any time by deactivating their camera and microphone and, if necessary, logging out of the meeting.

The storage of recordings and transcripts is limited to 60 days.

2.1.1.3 SharePoint & Microsoft Office

We use SharePoint and Microsoft Office for collaborative work and file sharing. Personal data is processed for the purpose of providing, organizing, and managing work and communication processes. This includes, in particular, the storage, sharing, editing, and version management of files, the coordination of work content, and internal communication.

The legal basis for data processing can be found in section 4 Legal bases for data processing.

2.1.1.4 Microsoft Dynamics 365

We work with Microsoft's Dynamics customer relationship management (CRM) tool. All data relating to our contacts and customers is stored and processed there, provided we have a legal basis for data processing. The CRM system is used for the purpose of making all contacts available to the relevant employees throughout the company, thereby enabling fast and satisfactory communication with you.

Data processing in our CRM system is based on your consent (Art. 6 (1) (a) GDPR), on the basis of a contract concluded or to be concluded between you and us (Art. 6 (1) (b) GDPR) or on the basis of an overriding legitimate interest on our part in data processing (Art. 6 (1) (f) GDPR).

Microsoft makes every effort to comply with all European data protection requirements, in particular the General Data Protection Regulation (GDPR). The data processed by and with Microsoft when using Dynamics is adequately secured in accordance with the state of the art.

The information provided above regarding the use of Microsoft 365 applies equally to the transfer of data to third countries.

Information about data protection in connection with Dynamics, including a white paper for download, a list of FAQs, etc. from Microsoft, can be found here: <https://docs.microsoft.com/de-de/dynamics365/get-started/gdpr/>

We use Outlook for e-mail communication as part of the Microsoft 365 package from Microsoft Inc, USA. We use Outlook to process incoming e-mails quickly and clearly via this standard solution, and to distribute and answer them internally.

For planning and conducting meetings and related actions, we use the Teams software from Microsoft, which enables us to effectively handle meetings by linking them to the other applications of the Microsoft 365 package.

We have entered into a Data Processing Addendum (DPA) with Microsoft. In this agreement, Microsoft undertakes to take measures that meet the requirements of the GDPR for data security and data protection. You can view the content of this agreement here:

<https://www.microsoft.com/licensing/docs/view/Professional-Services-Data-Protection-Addendum-DPA>

The data processing may be based on your consent (Art. 6 (1) (b) GDPR), on a contract concluded or to be concluded between you and us (Art. 6 (1) (b) GDPR) or on an overriding legitimate interest in data processing on our part (Art. 6 (1) (f) GDPR).

E-mail communication with you may be routed via Microsoft servers. Microsoft promises that all personal data processed via Microsoft 365 products for EU-based enterprise customers will be processed and stored exclusively within the EU. This promise applies to all of Microsoft's core

cloud services - Azure, Microsoft 365 and Dynamics 365, see Microsoft's statement:

<https://news.microsoft.com/de-de/unsere-antwort-an-europa-microsoft-ermoeslicht-speicherung-und-verarbeitung-von-daten-ausschliesslich-in-der-eu/>

This means that, in principle, there is no data transfer outside the EU or the EEA ("third country transfer"). Should a third country transfer nevertheless take place, we have concluded the EU standard contractual clauses with Microsoft. In this agreement, Microsoft undertakes to take and comply with measures that enable a level of data protection that is almost equivalent to that in the EU. The agreement of the EU Standard Contractual Clauses constitutes appropriate safeguards for carrying out a third country transfer (Art. 46 (1) in conjunction with (2) (c) GDPR).

Frequently asked questions about Microsoft and data protection are answered here:

<https://www.microsoft.com/de-de/trust-center/privacy/gdpr-faqs?market=de>.

2.2 Use of the Eloqua marketing tool from Oracle

We use the Eloqua marketing system from Oracle Corporation, Redwood City, CA, USA ("Eloqua") for all automated e-mails sent. The data required for this (regularly your e-mail address, if applicable your first and last name to be able to address you personally) is passed on to the Eloqua system for this purpose.

We have concluded the EU standard contractual clauses with Oracle. In these, Oracle undertakes to take and comply with measures that enable a level of data protection that is almost equivalent to the EU data protection level. In addition, we have agreed with Oracle on the additions to these standard contractual clauses recommended by the German data protection authorities for Oracle to take additional measures to further increase the level of data protection. The agreement of the EU standard contractual clauses with these additional measures constitutes appropriate safeguards to be able to carry out a third country transfer (Art. 46 (1) in conjunction with (2) (c) GDPR).

Data processing may be carried out based on your consent (Art. 6 (1) (a) GDPR), on the basis of a contract concluded or to be concluded between you and us (Art. 6 (1) (b) GDPR) or based on an overriding legitimate interest in data processing on our part (Art. 6 (1) (f) GDPR).

Under the laws of Germany, you will only receive advertising by e-mail if you have given your consent to receive advertising by e-mail (cf. § 7 (2) (3) UWG) or if the exceptions to the consent requirement in § 7 (3) UWG apply.

The e-mails sent automatically via Eloqua contain so-called web beacons or tracking pixels (e. g. one-pixel image files that are stored on our website). This makes it possible to determine whether an e-mail message has been opened and which links, if any, have been clicked on. In addition, technical information is stored (e. g. time of retrieval, IP address, browser type and operating system). This data is collected exclusively in pseudonymised form and is not linked to other personal data. The possibility of a direct reference to a person is excluded. This data is used exclusively for the statistical analysis of email campaigns. The evaluations serve us to recognise reading habits and to adapt our content to them or to send different content according to the interests of the readers.

Information on data protection at Eloqua can be found at: www.oracle.com/legal/privacy/privacy-policy.html

Please note that your data is usually transferred to a server in the USA and stored there. The USA is assessed by the European Court of Justice as a country with an insufficient level of data protection according to EU standards. There is a risk that your data may be processed by US authorities, for control and monitoring purposes, possibly also without any legal remedy.

2.3 Use of DocuSign for the purpose of concluding contracts

We use the services of DocuSign by the company DocuSign Germany GmbH, Neue Rothofstrasse 13-19, D-60313 Frankfurt (or the US parent company DocuSign, Inc., USA) for the creation and transmission of digital signatures for the purpose of concluding contracts.

DocuSign's services support us and you in setting up transactions digitally or electronically, carrying them out and/or proving their validity - for example, by signing a contract electronically.

We generally use DocuSign to conclude contracts. For this purpose, DocuSign processes, in the course of providing its services, those data that enable the parties to prove the validity of the transactions they have entered into. This data also includes the persons involved in the business transactions and the end devices used by these persons.

The data collected via DocuSign is stored on DocuSign servers.

Your use of DocuSign is purely voluntary in that you conclude a contract with us via DocuSign. The legal basis is therefore your consent (Art. 6 (1) (a) GDPR). If you wish to conclude the contract by other means, you can inform us so that we can conclude the contract with you in a conventional manner.

In principle, the data is processed within the EU or the EEA, so that no third country transfer takes place. Should a third country transfer nevertheless take place, we have concluded the EU standard contractual clauses with DocuSign. In this agreement, DocuSign undertakes to take measures and comply with measures that enable a level of data protection that is almost equivalent to that in the EU. The agreement of the EU Standard Contractual Clauses constitutes appropriate safeguards to carry out a third country transfer (Art. 46 (1) in conjunction with (2) (c) GDPR).

Further information on the handling of user data can be found in the DocuSign privacy policy at:

<https://www.docusign.de/unternehmen/datenschutz>

2.4 Telephone support for the free version of PTV Visum Publisher

In connection with the free versions of PTV Visum Publisher, we ask you for your telephone number. The purpose of data processing is to contact you and provide you with support and guidance. Your feedback will help us understand your use cases and improve the product to better meet your needs.

By voluntarily providing your telephone number and confirming the corresponding checkbox, you consent to the processing of your telephone number for the purpose of contacting you.

3 Method of Data Processing

Your data will be stored, processed, and managed in a database in compliance with our [technical and organisational measures](#)³ on our internal IT systems or in data protection-compliant online services used by us for this purpose.

The data is protected against access by unauthorised persons and against deletion and destruction in accordance with the state of the art. The data protection measures are regularly evaluated and adapted to the state of the art.

4 Legal Basis for Data Processing

4.1 Data processing based on consent (Art. 6 (1) (a) GDPR)

If you proactively send us an e-mail or fax or call us without prior contact, the legal basis for the processing of the data is Art. 6 (1) (a) GDPR, as you have given your consent to the associated data processing by actively contacting us. This applies at least to the usual scope of such data processing, which is necessary to answer your enquiry and is therefore also expected by you.

For any further data processing, one of the other legal bases described below is relevant.

Consent is also the correct legal basis if and insofar as you voluntarily make use of services or tools that we have described above, e. g. conclude a contract with us via DocuSign, in the knowledge of the associated data processing.

4.2 Data processing due to contract performance (Art. 6 (1) (b) GDPR)

The data processing of interested parties or our customers (new and existing customers) is carried out in accordance with Art. 6 (1) (b) GDPR.

The processing of the data is necessary for the performance of a contract to which you are a party (customer support, warranty, service provision, etc.) or for the implementation of pre-contractual measures (contacting, preparation of offers, contract negotiations, etc.), which are carried out at your request.

In addition to the processing of support cases or general communication for contract initiation and contract processing, this is particularly the case with our reseller activities. Here, we conclude at least a free brokerage contract with you, for the fulfilment of which data processing is necessary.

4.3 Data processing due to legitimate interests (Article 6 (1) (f) GDPR)

Furthermore, data processing is carried out based on our legitimate interest pursuant to Art. 6 (1) (f) GDPR.

³ <https://www.ptvgroup.com/en/legal-documents/data-processing-agreement-annex>

This applies, for example, to data processing via Eloqua for automated e-mail transmission. This transmission can take place if we want to inform you about the receipt of your e-mail without further examination of your e-mail or if you send us an automatically readable or standardisable enquiry with your e-mail enquiry, which we answer by means of automated answer control via Eloqua. Our legitimate interest in these cases lies in the need to be able to answer the enquiries to us as efficiently and quickly as possible and to be able to move forward with the communication with you as quickly as possible to the point you have requested.

Data processing in connection with evaluation for the purpose of statistics also falls under legitimate interest. Our legitimate interest here is specifically that the collection and processing of the data supports our advertising and marketing interests. Furthermore, a legitimate interest is to check and, if necessary, improve the future orientation of our services and products regarding the evaluated information of our interested parties and customers.

Your interests and fundamental freedoms worthy of protection do not outweigh our interests in this case after we have weighed them. We would like to point out the special right of objection that you have with this legal basis (see the note at the end of this information).

5 Storage Duration

5.1 Data processing by way of consent

If you have effectively consented to one of the data processing operations described here, we will store the data until you informally send us a revocation concerning this data processing, which you can do at any time with effect for the future.

5.2 Data processing for the performance of a contract

The personal data collected by us for the purpose of initiating or fulfilling the contract will be stored until the end of the contract negotiations or until the expiry of the contract.

We also store the data until claims can no longer be asserted under the contract, i. e. until the statute of limitations has expired.

The general limitation period according to § 195 BGB is three (3) years. However, certain claims, such as claims for damages, only become time-barred after 30 years (cf. § 197 BGB). If there is reasonable cause to assume that this is relevant in an individual case, we store the personal data for this period. The aforementioned limitation periods begin at the end of the year (i. e. 31 December) in which the claim arose and the creditor becomes aware of the circumstances giving rise to the claim and the debtor or should have become aware without gross negligence.

5.3 Data Protection based on legitimate interests

We store the data collected on the basis of a legitimate interest until the legitimate interest no longer exists, or in case the weighing comes to a different result or you have effectively objected in accordance with Art. 21 GDPR (cf. the note on the special right of objection at the end of this

information) and we otherwise have no other authorisation to continue the data processing, which may be possible despite such an objection.

5.4 Reference to retention and storage obligations

If we are obliged to store data for a longer period of time in accordance with Art. 6 (1) Sent. 1 (c) GDPR due to obligations to store and document certain data under tax and commercial law, we will store this data for the duration of the statutory periods.

6 Rights of data subjects

If your personal data is being processed, you are the 'data subject' and you have the following rights in relation to us as the data controller:

6.1 Right of access

You have the right to obtain from us confirmation as to whether or not personal data concerning you is being processed. If this is the case, you have a right of access to this personal data and further information, which you can find in Art. 15 GDPR. You can contact us by post or e-mail for this purpose.

6.2 Right to rectification

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing mentioned above, you also have the right to have incomplete personal data completed, including by means of providing a supplementary statement. You can contact us by post or e-mail for this purpose.

6.3 Right to erasure

You have the right to obtain from us the erasure of personal data concerning you without undue delay if one of the requirements of Article 17 GDPR is met. You can contact us by post or e-mail for this purpose.

6.4 Right to restriction of processing

You have the right to obtain from us restriction of processing if one of the requirements of Article 18 GDPR applies. You can contact us by post or e-mail for this purpose.

6.5 Right to notification

If you exercise your right to rectification, erasure or restriction of processing against the controller, the controller is obliged to notify the rectification, erasure or restriction of processing to all

recipients to whom the personal data concerning you have been disclosed, unless this proves impossible or involves disproportionate effort.

You are entitled to request that the controller inform you of these recipients.

6.6 Right to data portability

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit this data to another controller without hindrance from us if the conditions of Article 20 GDPR are met. You can contact us by post or e-mail for this purpose.

6.7 Right to object to processing on legitimate interest grounds and to direct marketing

If, in exceptional cases, we process personal data on the basis of Article 6 (1) (f) GDPR (i. e. on the basis of legitimate interests), you have the right to object to the processing of your personal data by us at any time on grounds relating to your particular situation. If we cannot demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if we are processing your data for the purposes of direct marketing, we will no longer process your data (see Article 21 GDPR). You can contact us by post or e-mail for this purpose.

An objection in this sense is also a technical method that you use, such as a clear technical information that your web browser sends to us ("do-not-track" message).

Where personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data relating to you for such marketing purposes, including profiling to the extent that it is related to such direct marketing.

6.8 Right to withdraw consent

You have the right to withdraw your consent to the collection and use of personal data at any time with effect for the future. You can contact us by post or e-mail for this purpose. This does not affect the lawfulness of the processing carried out on the basis of the consent until it is revoked.

6.9 Automated decision making including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. Unless the decision is necessary for the conclusion or performance of a contract between you and us, it is authorised by the law of the Union or of the Member State to which we are subject and that law contains appropriate measures to safeguard your rights and freedoms and your legitimate interests, or the decision is taken with your express consent.

We do not make such automated decisions.

6.10 Voluntary nature of data provision

If we are required by law or contract to collect personal data, we will indicate this at the time the data is collected. Some of the information we collect

is necessary for us to enter into a contract with you, i. e. if we cannot or cannot adequately perform our contractual obligations to you. You are under no obligation to provide the personal information. However, failure to do so may mean that we are unable to provide or offer a service, action, measure or similar requested by you or that it is not possible to enter into a contract with you.

6.11 Right to lodge a complaint with a supervisory authority

Without prejudice to other rights, you have the right to lodge a complaint with a data protection supervisory authority at any time, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data relating to you infringes data protection law.